

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

IRON WORKERS' LOCAL NO. 25 PENSION FUND;  
IRON WORKERS' LOCAL UNION NO. 25  
INDIVIDUAL ACCOUNT RETIREMENT FUND;  
IRON WORKERS' HEALTH FUND OF EASTERN  
MICHIGAN; IRON WORKERS LOCAL NO. 25  
VACATION PAY FUND; and IRON WORKERS'  
APPRENTICE FUND OF EASTERN MICHIGAN,  
Trust Funds Established and Administered  
Pursuant to Federal Law,

Plaintiffs,  
v.

Case No. 05-73576  
Hon. Victoria A. Roberts

VULCAN IRON WORKS, INC., a Michigan  
Corporation, VULCAN IRON, LLC., a Michigan  
Limited Liability Company, JIM R. EDWARDS,  
and MICHAEL A. JOHN JR., Individually.

Defendants.

---

DAVID J. SELWOCKI P51375  
ALEXANDRA C. AKAS P64004  
Sullivan, Ward, Asher & Patton, P.C.  
Attorneys for Plaintiffs  
1000 Maccabees Center  
25800 Northwestern Highway  
PO Box 222  
Southfield MI 48037-0222  
(248) 746-0700

---

**CONSENT JUDGMENT**

At a session of court held in the City of Detroit,  
Wayne County, Michigan on October October  
11, 2005.

PRESENT: Hon. Victoria A. Roberts  
U.S. District Court Judge

Defendants, VULCAN IRON WORKS, INC., by and through its President, Jim R. Edwards; VULCAN IRON, LLC., by and through its managing member, Jim R. Edwards, and

JIM R. EDWARDS, individually, consent to entry of a Judgment in favor of Plaintiffs in the amount of Two Hundred Fourteen Thousand Three Hundred Eighty One and 08/100 (\$214,381.08) Dollars.

The above named Defendants also consent to Plaintiffs moving to have this Honorable Court amend this Consent Judgment to include the mandates of 29 USC §1132(g)(2) based on further submissions by Plaintiffs. Said mandates include:

- A. Interest on the unpaid contributions;
- B. An amount equal to the greater of:
  - i. interest on the unpaid contributions; or
  - ii. liquidated damages provided for under the plan.
- C. Reasonable attorney fees and costs of the action; and
- D. Such other legal or equitable relief as this court deems appropriate.

It is further consented and therefore ordered, that the Corporate Defendant will undergo an audit and this Judgment will be amended to conform with same.

The parties also consent, and thereby if it is ordered that this Court maintain jurisdiction of this matter for purposes of satisfaction of this Judgment.

/s/ Victoria A. Roberts  
United States District Judge

Dated: October 11, 2005

The undersigned certifies that a copy of this document was served on the attorneys of record by electronic means or U.S. Mail on October 11, 2005.

s/Carol A. Pinegar  
Deputy Clerk

s/ David J. Selwocki w/signed consent of

Jim R. Edwards, President  
Vulcan Iron Works, Inc.

s/ David J. Selwocki

David J. Selwocki P51375  
Attorney for Plaintiffs

s/ David J. Selwocki w/signed consent of  
Jim R. Edwards, Managing Member  
Vulcan Iron, LLC

s/ David J. Selwocki w/signed consent of  
Jim R. Edwards, Individually

W0430420.WPD